

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SEALED

UNITED STATES OF AMERICA

CRIMINAL NO. 15- 10229

v.

VIOLATIONS:

1. TUAN DINH NGUYEN,
a/k/a "Lucky Nguyen," and

18 U.S.C. § 1349 -
Wire Fraud Conspiracy

2. [REDACTED],

18 U.S.C. § 1956(h) -
Money Laundering Conspiracy

Defendants.

18 U.S.C. § 1956(a)(3)(B) -
Money Laundering

18 U.S.C. § 1028A(a)(1) -
Aggravated Identity Theft

18 U.S.C. § 2 -
Aiding and Abetting

18 U.S.C. §§ 981(a)(1)(C) & 982(a)(1)
28 U.S.C. § 2461(c)
Criminal Forfeiture

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. Defendant TUAN DINH NGUYEN ("TUAN"), a/k/a "Lucky Nguyen," was a citizen of Vietnam who resided in Vietnam and Australia. TUAN controlled the e-mail accounts gapovn@yahoo.com and gapovn@gmail.com, among others.

2. Defendant [REDACTED] resided in Vietnam. [REDACTED]

controlled the e-mail accounts seojz@yahoo.com and mrseoo@gmail.com, among others.

[REDACTED]

3. CC1, a coconspirator not charged in this Indictment, controlled the e-mail account hongkhai_279@yahoo.com (“the Hongkhai Account”).

4. Until in or about December 2010, CW was a coconspirator of TUAN, [REDACTED], and others. CW thereafter agreed to work with and at the direction of law enforcement.

5. Amazon, eBay, and Buy.com were online auction websites over which subscribers could buy and sell consumer goods (“the Auction Websites”).

6. “Payment Card Data” included names, addresses, account numbers, security codes, and expiration dates associated with debit and credit card accounts.

7. Personally Identifiable Information (“PII”) included names, dates of birth, Social Security Numbers, phone numbers, residential addresses, e-mail addresses, and online usernames and passwords.

8. In or about and between December 2007 and December 2013, in the District of Massachusetts and elsewhere, the defendants, TUAN DINH NGUYEN, a/k/a “Lucky Nguyen,” and [REDACTED], together with CC1 and others known and unknown to the Grand Jury, conspired to use stolen Payment Card Data and PII to buy consumer goods online, sell those items over the Auction Websites, and wire the proceeds overseas.

9. To accomplish their objectives, TUAN, [REDACTED], and their coconspirators created fraudulent accounts at the Auction Websites, or used stolen usernames and passwords to take over subscribers’ legitimate accounts on the Auction Websites.

10. Using the fraudulently created or stolen Auction Website accounts, TUAN, [REDACTED], and their coconspirators posted popular consumer goods for sale on the Auction Websites, including, among other things, Apple merchandise, electronics, personal care items, and books.

11. When TUAN, [REDACTED], and their coconspirators posted these consumer goods for sale on the Auction Websites, they did not own or otherwise have the goods to sell.

12. Unwitting online customers ("Auction Winners") agreed to buy the consumer goods over the Auction Websites from TUAN, [REDACTED], and their coconspirators.

13. The Auction Winners sent online payments to TUAN, [REDACTED], and their coconspirators through the same Auction Website accounts that TUAN, [REDACTED] and their coconspirators controlled.

14. To obtain consumer goods that they had agreed to sell to Auction Winners, TUAN, [REDACTED], CC1, and their coconspirators used stolen Payment Card Data and PII to purchase the items from Walmart.com and other third-party e-commerce websites.

15. TUAN, [REDACTED], CC1, and their coconspirators caused the items that they purchased with stolen Payment Card Data and PII to be shipped to the Auction Winners, who never knew that the items they received were stolen.

16. To obtain the proceeds of their scheme, TUAN, [REDACTED], and their coconspirators recruited individuals living in the United States to participate in the scheme, by facilitating the shipment of the consumer goods to the Auction Winners, by withdrawing the proceeds of the scheme from the Auction Website accounts that TUAN, [REDACTED], and their coconspirators

controlled, and by wiring the proceeds overseas to bank accounts that TUAN, [REDACTED], and their coconspirators controlled.

17. The victims of the scheme included Wal-Mart.com and other e-commerce websites that accepted stolen Payment Card Data in payment for consumer goods, Payment Card issuers that had to reimburse customers for fraudulent purchases, and individuals whose Payment Card Data, PII, and Auction Website accounts were used without their permission.

CW

18. On or about March 11, 2011, CW, at the direction of law enforcement and in response to [REDACTED]'s request in furtherance of the scheme, e-mailed to [REDACTED] Sovereign Bank account numbers ending in 2330 ("the Sovereign 2330 Account") and 2348 ("the Sovereign 2348 Account").

19. On or about March 12, 2011, [REDACTED] e-mailed TUAN the information he received from CW regarding the Sovereign 2348 Account.

Amazon.com Order No. #102-2112070-6442624

20. On or about July 18, 2011 at approximately 9:10 a.m., TUAN, [REDACTED], and their coconspirators sold a Philips Sonicare electric toothbrush using an Amazon.com account belonging to Victim B under order number 102-211-2070-6442624 ("the 2624 Order").

21. On or about July 19, 2011 at approximately 7:39 a.m., TUAN e-mailed the PII and credit card number of Victim A to the Hongkhai Account.

22. On or about July 19, 2011 at approximately 12:46 p.m., TUAN e-mailed the Hongkhai Account under the subject "New Order 20-07" the 2624 Order's number, the name

and model number of the electric toothbrush, and the name, address, and phone number of an Auction Winner in Columbia, Maryland.

23. On or about July 19, 2011 at approximately 10:31 p.m., Victim A's Payment Card Data and PII was used without her permission to purchase the same model of electric toothbrush from Wal-Mart.com and to have that item shipped to the Auction Winner in Columbia, Maryland.

24. On or about July 20, 2011 at approximately 3:16 a.m., the Hongkhai Account was used to e-mail TUAN, under the header "11 Tracking," Victim A's Payment Card Data and PII and a tracking number for Walmart.com's shipment of the electric toothbrush to the Auction Winner.

25. On or about July 20, 2011 at approximately 3:24 a.m., TUAN e-mailed the tracking number and other information about the 2624 Order that he just received from the Hongkhai Account to [REDACTED].

26. On or about July 29, 2011, TUAN, [REDACTED], and their coconspirators caused approximately \$15,600 to be transferred from Victim B's Amazon.com account to the Sovereign 2348 Account.

27. On or about August 2, 2011, [REDACTED] e-mailed CW regarding the \$15,600 transfer to the Sovereign 2348 Account. In his e-mail, [REDACTED] deducted a commission for CW and a \$35 wire transfer fee from the \$15,600 figure and directed CW to wire the balance of the money to an account in [REDACTED]'s name at the Bank for Foreign Trade of Vietnam.

28. On or about August 5, 2011, law enforcement personnel wired \$14,077, which CW represented to be proceeds from the scheme, from the Sovereign 2348 Account to [REDACTED]'s Vietnamese bank account.

Amazon Order No. #103-1842354-4419418

29. On or about July 19, 2011 at approximately 4:14 p.m., TUAN e-mailed the Hongkhai Account the Payment Card Data and PII of Victim C.

30. On or about July 21, 2011 at approximately 5:40 a.m., TUAN, [REDACTED], and their coconspirators sold a Garmin Forerunner GPS running watch over the Amazon.com account of Victim D under order number #103-1842354-4419418 ("the 9418 Order").

31. On or about July 22, 2011 at approximately 12:26 a.m., TUAN e-mailed the Hongkhai Account, under the subject "New Orders 22-07," information regarding the 9418 Order's number, the name and model number of the running watch, and the name, address, and phone number of an Auction Winner in Lauderhill, Florida.

32. On or about July 26, 2011 at approximately 1:38 a.m., Victim C's Payment Card Data and PII was used without permission to purchase the same model of running watch from Wal-Mart.com and to have that item shipped to the Auction Winner in Lauderhill, Florida.

33. On or about July 26, 2011 at approximately 5:38 a.m., the Hongkhai Account e-mailed TUAN, under the subject "1 Tracking ngay [day] 22", with information regarding the 9418 Order, the PII and Payment Card Data of Victim C, and a tracking number for Walmart.com's shipment of the running watch to the address of the Auction Winner.

34. On or about July 30, 2011 at approximately 12:57 a.m., CW e-mailed TUAN the account number (ending in 1212) for a Sovereign Bank account in Massachusetts (“the Sovereign 1212 Account”).

35. On or about August 9, 2011, TUAN, [REDACTED], and their coconspirators caused approximately \$1,200 to be disbursed from Victim D’s Amazon.com account to the Sovereign 1212 Account.

36. On or about August 17, 2011 at approximately 12:58 a.m., [REDACTED] e-mailed CW about two disbursements from Amazon accounts made to two separate Sovereign Bank accounts: (1) an approximately \$1,200 disbursement to the Sovereign 1212 Account that matched the disbursement described in paragraph 35 above; and (2) an approximately \$12,600 disbursement to the Sovereign 2348 Account. [REDACTED] deducted a commission for CW from both of these amounts and directed CW to wire the balance of the money to an account in [REDACTED]’s name at the Bank for Foreign Trade of Vietnam.

37. On or about August 22, 2011, law enforcement personnel wired \$13,691 from the Sovereign 2348 Account, represented to be proceeds from the scheme, to [REDACTED]’s Vietnamese bank account.

Amazon Order No. #002-8543486-1064235

38. On or about June 5, 2011 at approximately 10:36 a.m., TUAN, [REDACTED], and their coconspirators sold a Kodak digital picture frame using the Amazon.com account of Victim E under Amazon order number 002-8543486-1064235 ("the 4235 Order").

39. On or about June 8, 2011 at approximately 9:29 a.m., TUAN e-mailed [REDACTED] the 4235 Order's number, the name and model number of the digital picture frame, and the name, address, and phone number of an Auction Winner in Edina, Minnesota.

40. On or about June 8, 2011 at approximately 10:39 a.m., [REDACTED] created and saved an e-mail containing four sets of stolen Payment Card Data and PII and three sets of account usernames and passwords, including Payment Card Data and PII for Victim F (of Escondido, California).

41. On or about June 9, 2011 at approximately 5:22 a.m., Victim F's Payment Card Data and PII was used to purchase the same model of digital picture frame from Wal-mart.com and to have that item shipped to the Auction Winner.

42. On or about June 9, 2011 at approximately 9:22 a.m., [REDACTED] e-mailed TUAN information regarding the 4235 Order, Victim F's Payment Card Data and PII, and a tracking number for Wal-mart's shipment of the digital picture frame to the Auction Winner.

43. On or prior to July 1, 2011, CW provided TUAN and [REDACTED] the account number for a Sovereign Bank account in Massachusetts ending in 0963 ("the Sovereign 0963 Account").

44. On or about July 1, 2011, TUAN, [REDACTED], and their coconspirators caused an approximately \$11,200 disbursement to be made from Victim E's Amazon.com account to the Sovereign 0963 Account.

Amazon Order No. #104-2407923-6173800

45. On or about July 25, 2011 at approximately 9:09 a.m., TUAN, [REDACTED] and their coconspirators sold a Fisher-Price My Little Snugabunny cradle and swing over Victim B's Amazon.com account under order number 104-2407923-6173800 ("the 3800 Order").

46. On or about July 26, 2011 at approximately 1:49 a.m., TUAN e-mailed the Hongkhai Account, under the subject "New Orders 26/07," with the 3800 Order's number, the name and model number of the cradle and swing, and the name, address, and phone number of an Auction Winner in Huntersville, North Carolina.

47. On or about July 26, 2011 at approximately 1:50 a.m., under the subject "9 Mas," TUAN e-mailed the Hongkhai Account approximately 9 sets of stolen Payment Card Data and PII, including the Payment Card Data and PII of Victim G (of Acton, Massachusetts).

48. On or about July 27, 2011 at approximately 12:47 a.m., Victim G's Payment Card Data and PII was used at Wal-Mart.com to purchase the same model of cradle and swing and to have that item shipped to the Auction Winner.

49. On or about July 28, 2011 at approximately 4:47 a.m., the Hongkhai Account e-mailed TUAN with information about the 3800 Order, Victim G's Payment Card Data and PII, and the tracking information for Wal-mart's shipment of the cradle and swing to the Auction Winner.

50. On or about July 28, 2011 at approximately 3:24 p.m., TUAN e-mailed the Hongkhai Account, under the subject "Update order chua co tracking", with information regarding the 3800 Order and the name, address, and phone number of the Auction Winner.

51. On or about July 29, 2011 at approximately 3:30 p.m., TUAN e-mailed [REDACTED] information about the 3800 Order and the tracking number associated with Walmart.com's shipment to the Auction Winner.

52. On or about July 29, 2011, TUAN, [REDACTED], and their coconspirators caused a disbursement of approximately \$15,600 to be made from Victim B's Amazon.com account to the Sovereign 2348 Account.

53. On or about August 2, 2011, [REDACTED] e-mailed CW regarding the approximately \$15,600 disbursement made from Victim B's Amazon.com account to the Sovereign 2348 Account. [REDACTED] deducted a commission for CW and instructed CW to wire the balance, approximately \$14,000, to an account in [REDACTED]'s name at the Bank of Foreign Trade for Vietnam.

54. On or about August 5, 2011, law enforcement personnel wired \$14,077 from the Sovereign 2348 Account, which CW represented to be proceeds from the scheme, to [REDACTED]'s Vietnamese bank account.

55. In this fashion, between December 2007 and December 2013, TUAN, [REDACTED] and their coconspirators stole \$500,000 in consumer goods and wired the proceeds overseas.

COUNT ONE

(Wire Fraud Conspiracy - 18 U.S.C. § 1349)

The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 55 of this Indictment and further charges that:

56. Between at least as early as December 2007 and continuing through in or about December 2013, in the District of Massachusetts and elsewhere, the defendants,

1. TUAN DINH NGUYEN,
a/k/a "Lucky Nguyen," and
2. [REDACTED]

knowingly conspired and agreed with other persons known and unknown to the Grand Jury to commit wire fraud, that is, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, to transmit and to cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds for the purpose of executing that scheme and artifice, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

(18 U.S.C. § 1956(h) - Money Laundering Conspiracy)

57. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 55 of this Indictment and further charges that:

58. From a date unknown to the Grand Jury, but from at least in or about December 2007 through in or about December 2013, in the District of Massachusetts, and elsewhere,

1. TUAN DINH NGUYEN,
a/k/a "Lucky Nguyen," and
2. [REDACTED],

the defendants herein, knowingly conspired and agreed with each other and with other persons known and unknown to the Grand Jury,

- 1) to conduct one and more financial transactions affecting interstate and foreign commerce, which transactions in fact involved the proceeds of specified unlawful activity, that is, the conspiracy to commit wire fraud as charged in Count 1, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and
- 2) to transport, transmit, and transfer funds from a place in the United States to and through a place outside the United States, knowing that the funds involved represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission, and transfer was designed in whole and in part

to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is, conspiracy to commit wire fraud as charged in Count 1, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS THREE THROUGH SIXTEEN

(18 U.S.C. § 1956(a)(3)(B) - Money Laundering, 18 U.S.C. § 2 - Aiding and Abetting)

59. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 55 of this Indictment and further charges that:

60. On or about the dates set forth below, in the District of Massachusetts and elsewhere,

1. TUAN DINH NGUYEN,
a/k/a "Lucky Nguyen," and
2. [REDACTED],

the defendants herein, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, that is, the conspiracy to commit wire fraud charged in Count 1, did knowingly conduct and attempt to conduct the financial transactions set forth below, affecting interstate and foreign commerce, involving property represented by a person acting at the direction of and with the approval of a Federal official authorized to investigate and prosecute violations of Title 18, United States Code, Section 1956(a)(3), to be the proceeds of such specified unlawful activity, that is, the wire fraud conspiracy charged in Count 1.

COUNT	DATE	AMOUNT	SENDING ACCOUNT	RECEIVING ACCOUNT
3	04/11/2011	\$8,105	Sovereign Bank xxxxxxx2330	Westpac Bank xx5765
4	04/22/2011	\$8,922	Sovereign Bank xxxxxxx2330	Bank for Foreign Trade of Vietnam xxxx371801087
5	05/02/2011	\$4,804	Sovereign Bank xxxxxxx2330	Bank for Foreign Trade of Vietnam xxxx371801087
6	06/27/2011	\$7,455	Sovereign Bank xxxxxxx2348	Westpac Bank xx5765

7	07/07/2011	\$9,103	Sovereign Bank xxxxxxx2348	Bank for Foreign Trade of Vietnam xxxx370407871
8	07/22/2011	\$9,743	Sovereign Bank xxxxxxx2348	Bank for Foreign Trade of Vietnam xxxx370407871
9	08/5/2011	\$14,077	Sovereign Bank xxxxxxx2348	Bank for Foreign Trade of Vietnam xxxx370407871
10	08/22/2011	\$13,691	Sovereign Bank xxxxxxx2348	Bank for Foreign Trade of Vietnam xxxx370407871
11	08/31/2011	\$10,270	Sovereign Bank xxxxxxx2348	Commonwealth Bank xxx78856
12	08/31/2011	\$7,591	Sovereign Bank xxxxxxx1212	Westpac Bank xx2979
13	09/16/2011	\$7,014	Sovereign Bank xxxxxxx2348	Commonwealth Bank xxx78856
14	09/30/2011	\$19,860	Sovereign Bank xxxxxxx2348	Commonwealth Bank xxx78856
15	10/14/2011	\$8,209	Sovereign Bank xxxxxxx2348	Bank for Foreign Trade of Vietnam xxxx371801087
16	10/28/2011	\$9,149	Sovereign Bank xxxxxxx2348	Commonwealth Bank xxx78856

In violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

COUNT SEVENTEEN

(18 U.S.C. § 1028A(a)(1) Aggravated Identity Theft)

61. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 18 and 44 through 54 of this Indictment and further charges that:

62. Between on or about July 25, 2011 and on or about August 17, 2011, in the District of Massachusetts and elsewhere, defendant

1. TUAN DINH NGUYEN,
a/k/a "Lucky Nguyen,"

did, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, a felony violation contained in chapter 63 of Title 18 of the United States Code -- that is, the conspiracy to commit wire fraud charged in Count 1 -- knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, Victim G's name, residential address, phone number, e-mail address, and credit card number.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE ALLEGATIONS

(18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(1))

The Grand Jury for the District of Massachusetts further charges that:

63. Upon conviction of the offense alleged in Count One of this Indictment, the defendants,

1. TUAN DINH NGUYEN,
a/k/a "Lucky Nguyen," and
2. [REDACTED],

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), jointly and severally, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including, but not limited to a money judgment for at least \$500,000 in United States currency.

64. Upon conviction of one or more of the offenses charged in Counts Two through Sixteen of this Indictment, the defendants,

1. TUAN DINH NGUYEN,
a/k/a "Lucky Nguyen," and
2. [REDACTED],

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(1), jointly and severally, any property, real or personal, involved in such offense, or any property traceable to such property, including, but not limited to a money judgement for at least \$500,000 in United States currency.

65. If any of the property described in Paragraphs 63 and 64 above, as a result of any act or omission of one or both of the defendants --

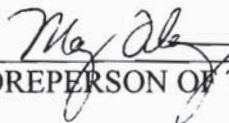
- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


it is the intention of the United States of America, pursuant to 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of all other property of the defendants up to the value of the property described in Paragraphs 63 and 64 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 982(a)(1), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL,



FOREPERSON OF THE GRAND JURY

CARMEN M. ORTIZ
UNITED STATES ATTORNEY


By: SETH B. KOSTO
ASSISTANT U.S. ATTORNEY
U.S. Attorney's Office for the District of Massachusetts
One Courthouse Way
Boston, Massachusetts 02210
(617) 748-3230
seth.kosto@usdoj.gov

August 19, 2015

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk
8/19/15 @ 12:50h

15cr10229

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency DHS-HSICity Acton

Related Case Information:

County Middlesex

Superseding Ind./ Inf. _____ Case No. _____

Same Defendant _____ New Defendant _____

Magistrate Judge Case Number _____

Search Warrant Case Number 12-1034 12-1033 12-1087 (RBC)

R 20/R 40 from District of _____

Defendant Information:

Defendant Name Tuan Dinh Nguyen Juvenile: ☐ Yes ☒ NoIs this person an attorney and/or a member of any state/federal bar: ☐ Yes ☒ NoAlias Name Lucky NguyenAddress (City & State) Melbourne, AustraliaBirth date (Yr only): 1988 SSN (last4#): _____ Sex M Race: Asian Nationality: Vietnamese

Defense Counsel if known: _____ Address _____

Bar Number _____

U.S. Attorney Information:

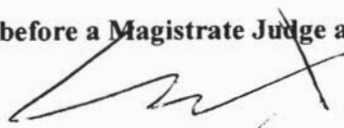
AUSA Seth Kosto Bar Number if applicable _____Interpreter: ☒ Yes ☐ No List language and/or dialect: VietnameseVictims: ☒ Yes ☐ No If yes, are there multiple crime victims under 18 USC§3771(d)(2) ☐ Yes ☒ NoMatter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested☐ Regular Process☐ In Custody

Location Status:

Arrest Date _____

☐ Already in Federal Custody as of _____ in _____☐ Already in State Custody at _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by: _____ on _____Charging Document: ☐ Complaint ☐ Information ☐ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 17

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: August 19, 2015Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Tuan Dinh Nguyen

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1349</u>	<u>Wire fraud conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1956(h)</u>	<u>Money laundering conspiracy</u>	<u>2</u>
Set 3	<u>18 USC 1956(a)(3)(B)</u>	<u>Money laundering</u>	<u>3-16</u>
Set 4	<u>18 USC 2</u>	<u>Aiding and Abetting</u>	<u>3-16</u>
Set 5	<u>18 USC 1028A</u>	<u>Aggravated identity theft</u>	<u>17</u>
Set 6	<u>18 USC 981-2, 28 USC 2461</u>	<u>Forfeiture allegations</u>	<u>N/A</u>
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

Criminal Case Cover Sheet **U.S. District Court - District of Massachusetts**

Place of Offense: _____ Category No. II Investigating Agency DHS-HSI

City Acton Related Case Information:

County Middlesex Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number 12-1034 12-1033 12-1087 (RBC)
R 20/R 40 from District of _____

Defendant Information:

Defendant Name [REDACTED] Juvenile: ☐ Yes ☒ No

Is this person an attorney and/or a member of any state/federal bar: ☐ Yes ☒ No

Alias Name _____

Address _____ (City & State) [REDACTED]

Birth date (Yr only): _____ SSN (last4#): _____ Sex M Race: Asian Nationality: Vietnamese

Defense Counsel if known: _____ Address _____

Bar Number _____

U.S. Attorney Information:

AUSA Seth Kosto Bar Number if applicable _____

Interpreter: ☒ Yes ☐ No List language and/or dialect: Vietnamese

Victims: ☒ Yes ☐ No If yes, are there multiple crime victims under 18 USC§3771(d)(2) ☐ Yes ☒ No

Matter to be SEALED: ☒ Yes ☐ No

☒ Warrant Requested ☐ Regular Process ☐ In Custody

Location Status:

Arrest Date _____

☐ Already in Federal Custody as of _____ in _____

☐ Already in State Custody at _____ ☐ Serving Sentence ☐ Awaiting Trial

☐ On Pretrial Release: Ordered by: _____ on _____

Charging Document: ☐ Complaint ☐ Information ☐ Indictment

Total # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 16

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: August 19, 2015 Signature of AUSA: [Signature]

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant _____

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	18 USC 1349	Wire fraud conspiracy	1
Set 2	18 USC 1956(h)	Money laundering conspiracy	2
Set 3	18 USC 1956(a)(3)(B)	Money laundering	3-16
Set 4	18 USC 2	Aiding and Abetting	3-16
Set 5	18 USC 981-2, 28 USC 2461	Forfeiture allegations	N/A
Set 6			
Set 7			
Set 8			
Set 9			
Set 10			
Set 11			
Set 12			
Set 13			
Set 14			
Set 15			

ADDITIONAL INFORMATION: _____